

DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS & ST. JOHN

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

ROBERT A. JENKINS aka
TERRANCE L. HANLEY,

MAGISTRATE NUMBER 2014-

Defendant.

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about November 16, 2014, at St. Thomas, in the District of the Virgin Islands, the defendant, ROBERT A. JENKINS aka TERRANCE L. HANLEY, an alien, was found in the United States after having been deported therefrom on or about June 18, 2014, and not having obtained the express consent of the Secretary of Homeland Security to reapply for admission to the United States;

All in violation of Title 8, United States Code, Section 1326(a) and (b)(2).

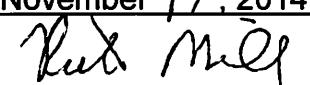
I further state that I am a Special Agent of Department of Homeland Security, Homeland Security Investigations (HSI) and that this complaint is based on the following:

SEE ATTACHED AFFIDAVIT, INCORPORATED HEREIN BY REFERENCE.

Continued on the attached sheet and made a part hereof: ☒ YES ☐ NO


John J. Ferek
Special Agent
Homeland Security Investigations (HSI)

Sworn to before me and subscribed in my presence.

November 17, 2014 at St. Thomas, U.S. Virgin Islands

Ruth Miller
United States Magistrate Judge

May No. 2014-34

**IN THE DISTRICT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

DISTRICT COURT OF THE VIRGIN ISLANDS)
DIVISION OF ST. THOMAS AND ST. JOHN)

SS:

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ST. THOMAS AND ST. JOHN

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST
WARRANT**

I, John J. Ferek, being first duly sworn, do hereby depose and state that:

1. I am a Special Agent employed by the United States Department of Homeland Security, U.S. Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI"). I am assigned to the Office of the Resident Agent in Charge for St. Thomas, Virgin Islands. I have been employed as a Special Agent with HSI since August of 2010. I am a graduate of the Federal Law Enforcement Training Center's Criminal Investigator Training Program and the U.S. Immigration and Customs Enforcement – Homeland Security Investigations ("HSI") Academy's Special Agent Training Program located in Glynco, Georgia. Prior to becoming a Special Agent, I have held the federal law enforcement positions of Immigration Enforcement Agent ("IEA") and Deportation Officer with Immigration and Customs Enforcement - Enforcement Removal Operations ("ERO"), and United States Border Patrol Agent in which I am a graduate of the United States Border Patrol Academy held at the Federal Law Enforcement Training Center in Artesia, New Mexico. I am a Graduate of West Virginia University and hold a Bachelor's Degree in Computer Science.

2. My duties as an HSI Special Agent include, but are not limited to, investigating violations of the Immigration and Nationality Act. I have received extensive training in investigating violations of and enforcing the immigration laws of the United States.

3. On November 16, 2014, at approximately 1800 hours, HSI special agents received a call from Supervisory Customs and Border Protection Officer (SCBPO) James Heil, from the Customs and Border Protection Office located at the Cyril E. King Airport in St. Thomas, Virgin Islands, regarding an individual attempting to use a suspected fraudulent Florida Driver's License as identification to board an aircraft.

4. On November 16, 2014, at approximately 1711 hours, a subject approached Customs and Border Protection (CBP) Officer Ivan Figueroa's inspection booth. The subject presented, what appeared to be, a Florida Class E Driver's License bearing license number "J525 761 71 390 0", the name Robert A. JENKINS, and date of birth: 10-30-1971. The subject also presented a signed CBP Form 6059B bearing the name Robert JENKINS and the date of birth: 10/30/1971.

5. CBP Officer Figueroa questioned the subject to his country of citizenship. The subject responded that he was a United States Citizen. CBP Officer Figueroa asked the subject his place of birth. The subject responded Florida.

6. CBP Officer Figueroa escorted the subject to secondary inspection for further investigation.

7. On November 16, 2014, at approximately 1715 hours, SCBPO Heil asked the subject his place of birth. The subject responded Bronx, New York. SCBP Heil asked the subject his age. The subject responded 42. SCBPO Heil asked the subject where he

went to high school. The subject was unable to provide an answer. SCBPO Heil advised an officer under his command to take the subject's fingerprints to search law enforcement biometric databases.

8. Immigration and criminal law enforcement databases, based on fingerprint biometrics, revealed that the subject is Terrance L. HANLEY (DOB: 06/02/1969; FBI# 579650DC5; Alien Registration Number 074-246-899), a citizen and national of the Federation of Saint Kitts and Nevis in the West Indies.

9. Law enforcement databases revealed other possible aliases to include: Terrance L. HANLEY; Lester BROWN; XX HAMMER; Hammer HANLEY; Lester Brown HANLEY; Terrance HANLEY; Terrance Louis HANLEY; Robert A. JENKINS; XX LESTER, Hanley L. TERRANCE.

10. Law enforcement databases revealed possible alias dates of birth to include: 06/02/1969; 06/06/1969; 10/30/1971.

11. Criminal history checks revealed: A December 2, 2003 arrest by US Customs Investigations in New York, New York for violations of Title 21 USC 846 – Attempt and Conspiracy to Distribute Heroin, Cocaine, Marijuana; Title 21 USC 963 – Conspiracy to Import Cocaine and Marijuana; and Title 21 841 Distribution of Heroin. Subject appears to have been sentenced to 45 months custody and 4 years supervised release. A February 21, 2014 arrest by the New York City Police Department (NYPD) for Misdemeanor Petit Larceny and Misdemeanor Criminal Possession of Stolen Property.

12. Immigration history checks revealed: An immigration judge ordered removal from the United States on May 20, 2008. Subject was removed from the United States on June 18, 2014.

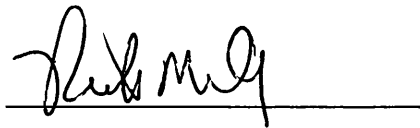
Based on my training and experience, I respectfully submit to the Court that probable cause exists to believe that on or about November 16, 2014, in St. Thomas, within the District of the Virgin Islands, that Terrance L. HANLEY aka Lester BROWN; aka XX HAMMER; aka Hammer HANLEY; aka Lester Brown HANLEY; aka Terrance HANLEY; aka Terrance Louis HANLEY; aka Robert A. JENKINS; aka XX LESTER, aka Hanley L. TERRANCE, did knowingly re-enter the United States as an alien previously removed from the United States and whose removal was subsequent to a conviction for commission of an aggravated felony in violation of Title 8 USC 1326(a) and (b)(2).

Further Affiant Sayeth Not.

A handwritten signature in black ink, appearing to read 'John J. Ferek', written over a horizontal line.

John J. Ferek
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me this 17th day of November, 2014.

A handwritten signature in black ink, appearing to read 'Ruth Miller', written over a horizontal line.

Honorable Ruth Miller
Magistrate Judge
District Court of the Virgin Islands